

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

MARY L. "NICKI" M. BOLAND

PLAINTIFF

VS.

CIVIL ACTION NO. 3:17-CV-803-LG-RHW

MISSISSIPPI DEPARTMENT OF PUBLIC SAFETY

DEFENDANT

DECLARATION

**STATE OF MISSISSIPPI
COUNTY OF MADISON**

I, Ray Sims, make the following declaration pursuant to 28 U.S.C. §1746:

1. I am an adult resident citizen of Rankin County, Mississippi. I am competent to testify, and the assertions set forth herein are based upon my personal knowledge.

2. I am the Executive Director at the Mississippi Department of Safety Planning ("PSP"), a division of the Mississippi Department of Public Safety ("DPS"). I served in this position in an interim capacity from August 2016 until May of 2017, when I was officially appointed to the position.


3. Since August 2016, the following persons have been terminated from their positions at PSP:

- A. Penny Corn, white female, termination date: 10/17/16;
- B. Twyla Jennings, white female, termination date 11/30/16;
- C. Virginia Stubbs, white female, termination date 12/29/16;
- D. Mary Kathleen Lukens, Asian American female, termination date: 4/18/17;
- E. Gussie Stutts, black female, termination date 4/19/17;

- F. Mary "Nicki" Boland, white female, termination date 4/21/17;
- G. Joyce Corley, black female, termination date 8/31/17;
- H. Jay Eads, white male, termination date 8/31/17. (Eads resigned *in lieu* of being terminated. His employment would have been terminated had he not resigned.)

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 14th day of December, 2018.



Ray Sims